



September 10, 2013

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Dear Sir/Madam,

I am writing in response to the FCC's Notice of Proposed Rulemaking for changes to the E-Rate program. I would like to thank the FCC for their continued support; the E-Rate program has been instrumental in providing telecommunications and Internet access for our 5,900 students. While the benefits of the E-Rate program are clear, there are some drawbacks.

Administrative Overhead

The requirements and paperwork are overly complex and costly for all parties involved. For example, organizations are unlikely to change internet providers every year, but the paperwork does not reflect that reality.

Local Prioritization of Expenditures

The complex rules and nearly-guaranteed funding of Priority 1 requests has led to vendors "gaming" the E-Rate process. I frequently receive advertisements from vendors touting their Priority-1-eligible services that make little sense for our district technically, but are attractive financially due to the E-Rate funding rules and procedures.

Ineligible Equipment

Our district is rarely eligible for needed Priority 2 equipment such as telephones, switches, or wireless access points due to our 71% discount rate. So while we can request and receive needed Internet bandwidth, we cannot secure E-Rate funds to install the necessary equipment such as wireless access points.

In addition to increased E-Rate funding, if our district was provided a per-student dollar amount for telecommunications, networking, and Internet access, we would be able to prioritize and optimize our expenses to better serve our students without artificial rules influencing the economics of our purchases.

Thank you for your time and the opportunity to provide comments.

Kevin Calvert
Director of Technology
Stillwater Public Schools

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